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FIRM and AFFILIATE OFFICES

GREGORY P. GULIA
DIRECT DIAL: 212.692.1027
PERSONAL FAX: 212.202.6014
E-MAIL: gpgulia@duanemorris.com

www.duanemorris.com

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April 30, 2015

BY ECF

Hon. Edgardo Ramos
Thurgood Marshall
United States Courthouse
40 Foley Square
Courtroom 619
New York, NY 10007

Re: *Conopco, Inc. v. Wells Enterprises, Inc.*
(Civil Action No.: 14 CV 6210) (ER)

Dear Judge Ramos:

We submit this letter on behalf of the parties, plaintiff Conopco, Inc. and defendant Wells Enterprises, Inc., to respectfully request the Court to continue the case deadlines set forth in the Court's order dated January 20, 2015 by 45 days as follows:

Event	Current Deadline	Proposed Deadline
Non-expert depositions	April 30, 2015	June 15, 2015
Further interrogatories, including expert interrogatories	April 30, 2015	June 15, 2015
Expert reports	May 8, 2015	June 22, 2015
Rebuttal expert reports	June 8, 2015	July 23, 2015
Expert depositions	July 14, 2015	August 28, 2015

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Event	Current Deadline	Proposed Deadline
All discovery shall be completed by	July 14, 2015	August 28, 2015
Case management conference	July 15, 2015 at 11:00 a.m.	approximately August 31, 2015 depending on the Court's availability

This request is the parties' first request to extend the deadlines set forth in the Court's January 20, 2015 order. This requested extension is not being sought for the purpose of delay. Indeed, the parties have attempted to diligently prosecute this action and conduct discovery as well as pursue an amicable resolution of the matter. Both parties have exchanged their initial disclosures and both parties have served written discovery requests and responses (including document requests, interrogatories and requests for admission). However, while the parties have been diligently searching their records for documents responsive to the document requests, neither party has produced responsive documents to the other party. Moreover, while the parties expect to serve documents and conduct depositions shortly, the current discovery schedule does not afford sufficient time to take depositions and to complete discovery. Thus, the parties, by and through their attorneys of record, hereby stipulate and request that the aforementioned dates set forth in the Court's January 20, 2015 order be continued as set forth above.

We thank Your Honor for your consideration of this request.

Respectfully submitted,


 Gregory P. Gulia

GPG:slj

cc: Natalie Hanlon-Leh, Esq. (by E-mail)
 Beth Ilana Goldman, Esq. (by E-mail)
 Christopher Noyes, Esq. (by E-mail)